

Name of Tribal Chair  
 Title  
 Tribe Name  
 Address

The U.S. Environmental Protection Agency Region 9 is pleased to announce the availability of financial assistance as follows:

*APPLICATION DUE DATE:* \_\_\_\_\_

*TYPE:* NEW grant or AMENDMENT to current grant # \_\_\_\_\_

*PROGRAM TITLE:* Performance Partnership Grant (PPG)

*STATUTORY AUTHORITY:* Appropriation Act of 1996 (PL-104-134)

*CATALOG OF FEDERAL*

*DOMESTIC ASSISTANCE NO.:* 66.605

(A complete single application and final workplan must be submitted using grants.gov.)

*DELEGATION OF AUTHORITY:* 1-101 Performance Partnership Grants

*FEDERAL FUNDS AVAILABLE and  
 REQUIRED NON-FEDERAL MATCH:*

PROGRAM (Sample)	Federal Amount Available	Required Match* (*Based on Total Project Cost)	TOTAL
CWA-106 (Water Pollution Control)	\$	\$ (5%)	
CWA-319 (Non-point Source) - BASE - COMPETITIVE	\$	\$ (5%)	
General Assistance Program (GAP) - CORE - SUPPLEMENTAL	\$116,000	0%	
TOTAL:	\$	\$	

GAP funds shown in the table above include \$102,800 to support GAP funding activities for one year. An additional \$13,200 has been tentatively set aside is supplemental as follows: \$7,384 for the Environmental Director raise, which include fringe and indirect; \$5,316 for the Solid Waste Technician, which include fringe for one year; and \$500 for disposal of SW/HAZMAT during Earth Day event. The total tentative award for your GAP is \$116,000.

A complete single application with one workplan and budget reflecting the above comments must be submitted by the due date indicated. In completing your application, enter the Catalog of Federal Assistance Number (CFDA) for PPGs – 66.605 – in box #11 on SF-424A application form, not the CFDA for any of the individual grant programs going into the PPG.

Effective **February 17, 2015**, EPA grant applicants must use Grants.gov to submit their applications. The Grants.gov registration process can take up to 30 days to complete. Therefore, it is highly recommended that EPA applicants complete their registration on grants.gov now. Also, your organization's registration in SAM.gov must be active to utilize Grants.gov. If it appears that the grants.gov registration process may prevent you from submitting your application by the due date aforementioned, then please contact [support@grants.gov](mailto:support@grants.gov) or call 1-800-518-4726 as support is available 24 hours a day and 7 days a week. You should also notify your Project Officer before the application due date to request an extension.

Please review both Attachment 2 on grants.gov instructions and Attachment 3 on Region 9 Guidance Information for Applicants (or go to <http://www.epa.gov/region9/funding/information.html>) for additional resources on Grants.gov, Federal Regulations, and new EPA requirements. We suggest you forward these materials to your Project Manager, Financial Officer and any other personnel in your organization requiring this information.

Since there may have been changes to various EPA assistance regulations, please remember to obtain a copy of the Code of Federal Regulations, Title 40, Parts 1-49. This CFR is updated every July 1 and includes the Chapter I, Subchapter B, which are regulations applicable to your cooperative agreement. The CFR is available through the internet at the following address:  
<http://www.epa.gov/region09/funding/before.html>.

Questions regarding the application or administrative/fiscal matters as well as the mandatory use of grants.gov should be referred to Martha Villarreal of the EPA Region 9 Grants Management Office, at (415) 972-3699. Please contact your GAP Project Officer, Morena Villanueva at (415) 947-4239, or contact me at (415) 972-3562, regarding programmatic questions (e.g. development of final PPG workplan).

Sincerely,

Jay Colingham  
EPA Project Officer

Enclosures

1. Work plan Comments
2. Grants.gov Instructions Guide
3. Region 9 Guidance Information for Applicants
6. ETEP Work plan Sample

cc: Zack Sampsel, Environmental Director (w/work plan comments)  
Lenora Steele, Tribal Administrator

## **2016 GAP Work Plan Comments Pinoleville Pomo Nation**

Thank you for developing an outcome-oriented workplan. The following observations and requests were written with the intent of strengthening the Tribe's GAP workplan, identifying possible assistance, and ensuring the workplan meets GAP guidelines. These comments pertain to the 2015-2016 work plan that was submitted with your GAP proposal in December 2014. Please insure that these comments are addressed in your final GAP work plan.

### **General Definitions and References**

1. The following references are useful for understanding GAP in general, for getting an understanding for environmental outcomes, etc.  
2013 Guidance on the Award and Management of General Assistance Program Agreements and Appendix I, Guidebook for Building Tribal Environmental Program Capacity  
<http://www.epa.gov/region9/funding/pdfs/tribal-gap/r9-gap-guidance.pdf>  
GAP Act (<http://www.epa.gov/Indian/pdfs/4368b.pdf>)  
2015 GAP Grant Notification (<http://www.epa.gov/region09/funding/tribal-gap.html>)  
EPA Strategic Plan (<http://www2.epa.gov/planandbudget/strategicplan>)
2. Environmental outcomes should be expressed in terms of improvements to public health, the environment, or human behavior. They can also reflect improved tribal capacity to protect public health or the environment. Intermediate outcomes could reflect a) improved human health or environmental conditions, b) reduced risks to human health or the environment c) increased tribal capabilities in legal, enforcement, technical, communication, or administrative areas. Long-term outcomes could include attainment of desired environmental conditions (e.g., water quality standards are met) or human health goals, or attainment of desired capacity to plan, develop, implement, manage and sustain tribal environmental programs.
3. Please ensure that each component in your work plan contains one or more capacity indicators that appropriately links to the steps that are either underway or proposed to begin in the associated commitments. Capacity indicators represent the destination of the Tribe's work and therefore the Tribe should express how it will accomplish the tasks necessary to achieve the indicators proposed in its commitments. Moreover, capacity indicators should ideally be placed in the "Measures" section for each component in the work plan. More information on the appropriate use of indicators is found on page 13 of the GAP Guidance. A suite of indicators that the Tribe may consider for inclusion in its work plan is contained in Appendix I of the GAP Guidebook.
4. Please correct any typographic errors incurred as a result of pasting your work plan into GAP online; please note that GAP Online does not accept special punctuation or characters, including quotation marks, apostrophe, semicolon, or parenthesis.
5. Greening Grants Policy: EPA Region 9 has adopted a Greening Grants Policy which encourages grantees to carry out their EPA grant funded projects in a greener way. Your Project Officer will work with you to determine whether it is feasible to incorporate green practices into your work plan.

6. The Greening Grants Policy includes an attachment which describes many useful green practices. The policy furthers the objectives of EPA's 2011-15 Strategic Plan. The link to Greening Grant Policy is on the Region 9 Website Homepage, <http://www.epa.gov/region9/funding/greening-grants.html>

### **Budget Comments**

**Supplies:** GAP will fund office supplies in the amount of \$1,500. Please ensure this amount is reflected in your final budget application.

### **Work Plan Comments**

- Throughout the work plan, most of the commitment end dates are identified as 9/30/2016. Commitment end dates should reflect the actual expected completion date of the commitment, and should not all reflect the end of the grant year. For activities that may occur over the entire year, consider indicating milestone dates for completing specified portions of those activities. This can be accomplished by embedding milestone dates in your commitment or outputs and deliverables fields.
- Please complete the **Positions** description in each commitment. Indicate who will be doing these tasks.

### **Component 1: Improving Environmental Planning Through Networking**

Please revise each commitment end date as commitment end dates are listed after the grant period.

1.2 Under outputs and deliverables the word, “agreements” should be “attended.” Please revise or delete.

1.3 This training is a repeat of a FY2015 task, GAP cannot fund repeated training for GIS. Please delete or revise this commitment.

### **Component 2: Water Pollution Prevention Planning and Use (may want to add “and Research for Additional Funding”**

2.1 This activity was funded in FY2015. Furthermore, water quality protection and restoration activities such as writing proposal for creek restoration is not an eligible GAP activity. This activity may be eligible under CWA 319. Please delete this commitment or revise it with other eligible, allocable, and necessary work under GAP. For more information please see Appendix I of the Guidebook for water activities.

2.5 The cost of this commitment seems high. Please provide additional information to support the anticipated commitment cost. Also, this activity may be eligible under CWA 319. Please delete this commitment or revise it with other eligible, allocable, and necessary work under GAP.

### **Component 3: Solid Waste Management and Planning**

- Please revise each commitment end dates as commitment end dates are listed after the grant period.

- Our records show that the Tribe has an Integrated Solid Waste Management Plan from 2008. To ensure the greatest opportunity for success of your solid waste management program, it is recommended this ISWMP be updated to reflect the current solid waste management operations and needs of the Tribe. The agency recommends that the plan be reviewed on an annual basis to ensure consistency with the Tribe's priorities, and should be reauthorized every five years. Having an updated and relevant ISWMP is critical for maintaining a sustainable waste management program, and for identifying and organizing current waste management priorities for the Tribe. Prior to undertaking or concurrent with solid waste activities proposed in this workplan, the ISWMP should be updated and approved in this fiscal year. The Region 9 Tribal Solid Waste Team is available to provide technical assistance and a comprehensive review of the ISWMP.

3.1 Please submit appropriate outputs/deliverables to EPA. Additionally, please see additional comments below:

HHW cleanup events: Household Hazardous Waste (HHW) collection events are an important way to ensure proper disposal of household hazardous waste generated in the community. Careful consideration of the federal and applicable state regulations related to the storage and transportation of these materials is needed before an event is planned. Please consult EPA's *Household Hazardous Waste Collection: a Program Guide for Tribal Governments*, for detailed information. Deliverables must include the amount and types of waste collected/recycled during the event. The Region 9 GAP encourages the creation of long-term sustainable waste management programs. As such, as a deliverable to this grant, the Tribe is requested to research and submit information on other HHW collection events that may be taking place within the County or other local jurisdictions to determine if the Tribe might partner with other entities to ensure events are cost effective.

<http://www.epa.gov/region9/waste/tribal/pdf/final-hhw-guide-oct-2007.pdf>.

- Community Cleanup Events: Community cleanup events can be beneficial to remove waste from tribal lands. Cleanup events involve the community in a service project that involves members in the process of finding solutions to prevent litter and reduce waste. However, community cleanup events should not replace sustainable solid waste collection services or serve as de facto waste hauling/disposal programs. EPA discourages the funding of ongoing waste hauling/disposal programs and ongoing O&M costs as they are not generally sustainable and do not encourage long-term solid waste management program development. The requested funding for the proposed community cleanup event is **not** approved unless the following criteria are met:
  - The Tribe has an Integrated Waste Management Plan (IWMP) and it demonstrates a clear need for community cleanup events;
  - The Tribe has a functioning waste collection/hauling/disposal in place that is used by the majority of the community;
  - The community cleanup event is **not** removing trash from individual homes, caused by individual users;
  - The community cleanup is **not** replacing regular trash collection services for residents or businesses;
  - The Tribe does **not** have active open dumping issues from within the community;
  - The Tribe tracks and reports the amount of waste collected for disposal and/or recycling and reports those numbers to EPA as a deliverable to this grant;

- The Tribe has a program in place to prevent future dumping that would eventually eliminate the need for community cleanup events;
- The Tribe documents community member participation and community outreach/training on proper waste disposal options; and
- The Tribe demonstrates that proper safety precautions will be taken, including training and personal protective equipment for participants.
- EPA supports the development of tribal solid waste management and pollution prevention programs, including green building efforts. If you have any questions regarding these programs please contact the EPA Region 9 Tribal Solid Waste Team:  
<http://www.epa.gov/region09/waste/tribal/index.html#contact>. Visit our websites for other available resources: <http://www.epa.gov/region09/waste/tribal> and <http://www.epa.gov/region9/greenbuilding/index.html>

#### **Component 4: Education & Outreach through Partnerships**

Please revise each commitment end date as commitment end dates are listed after the grant period.

4.2 This activity was completed in FY2015. Previously funded activities will not be approved for new funding. Please revise or delete this commitment.

#### **Component 5: Pollution Prevention through Education and Promotion of Green and Earth Friendly Technologies**

The component cost seems high for one activity. Please provide justification to support the component cost or add another commitment.

#### **Component 6: Summarize Progress: Jointly Evaluate (PPN/EPA) Performance**

Summary of this component was nicely done!

#### **Component 7: ETEP Development**

Enclosed is the ETEP workplan component template. If you have developed a recent environmental inventory, please inform your Project Officer and delete that commitment from the component. If you have questions about the other commitments, please contact your Project Officer.

Below is information about the Tribal Environmental Plan that will be part of the ETEP. The ETEP requirements are outlined in the National GAP Guidance on pages 13-19 of 22.

#### **Tribal Environmental Plan**

The GAP Guidance states the following about the content of the TEP:

Tribal governments should include environmental program priorities for their community in this section of the ETEP. For each priority, the following detail should be included: (1) short description of the priority; (2) the tribe's long-term environmental program development goals that help to address or support the priority; (3) intermediate program development milestones the tribal government would like to meet during the time period of the ETEP; (4) the tribe's plans to manage authorized environmental programs; and (5) any type of assistance (training, technical assistance, EPA direct implementation actions, financial, etc.) that may be needed. This information should be discussed between the tribe and EPA regional office staff to identify any connections between the tribe's priorities and the

implementation of the federal environmental programs, and to identify potential EPA assistance that could be provided to help the tribe accomplish the proposed actions.

EPA recognizes that the Tribal Environmental Plan is a tribal document that represents the issues of importance to the Tribe; the TEP can cover a range of issues including environmental impacts that may occur off the reservation, but impact the tribe or Tribal interests.

The TEP will help guide EPA and Tribal work in the future. As the GAP Guidance states, future approvable GAP work plans will be based on the contents of the TEP. Please include an appendix section where the tribal priorities each have a program indicator from the GAP Guidance and Guidebook.





